

**THE GUARDIAN LIFE INSURANCE
COMPANY OF AMERICA,**

V.

Defendant.

***MOTION FOR ADMISSION
PRO HAC VICE
and AFFIDAVIT***

NOW COMES Kevin Y. Zhao (“Local Counsel”), a member in good standing with the Bar with the United States Court for the Western District of North Carolina (“WDNC”), and moves for the admission of Ashlee D. Riopka (“Applicant”), who seeks permission to represent The Guardian Life Insurance Company of America (“Client”) in the above-captioned case.

By signing this motion, Local Counsel and Applicant certify that:

1. Applicant is a member in good standing of the bar of the highest court of the State where Applicant regularly practices law, which is the State of Alabama.

2. Applicant practices under the name of or as member of the following firm:

Firm Name: Maynard Nexsen PC
Mailing Address: 1901 6th Avenue North, Suite 1700
City/State/Zip: Birmingham, Alabama 35203
Telephone Number: (205) 254-1194 Facsimile: (205) 254-1999
Email Address: ariopka@maynardnexsen.com

3. Applicant certifies that she is also admitted to practice before and remains in good standing with the Courts in the following jurisdictions: U.S. District Court for the Northern District of Alabama (July 2015); U.S. District Court for the Middle District of Alabama (August 2015); and U.S. District Court for the Southern District of Alabama (August 2015).

4. Applicant certifies she has never been the subject of any formal suspension or disbarment proceedings; never been denied admission *pro hac vice* in this or any other jurisdiction or had *pro hac vice* admission revoked; never had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked; and has never received public discipline by any court or lawyer regulatory organization.

5. Applicant certifies that the Client requested Applicant to represent it in this matter, along with Local Counsel.

6. Applicant agrees to be subject to the Orders of the WDNC, including the Local Rules of the WDNC, and amenable to the disciplinary action and the civil jurisdiction of the WDNC in all respects as if the applicant were a regularly admitted and licensed member of the Bar of this Court in good standing.

7. Local Counsel is satisfied that Applicant is qualified to practice before the Bar of the WDNC.

8. The required fee for admission *pro hac vice* is being submitted with the filing of this motion.

9. Applicant consents to electronic notification.

By signing this Motion, we so certify.

This, the 6th day of September, 2024.

/s/ Kevin Y. Zhao
Local Counsel

/s/ Ashlee D. Riopka
Applicant

Joseph M. Moss, Jr.
N.C. Bar No. 20236
Kevin Y. Zhao
N.C. Bar No. 53680
MAYNARD NEXSEN PC
227 W. Trade Street, Suite #2300

Charlotte, NC 28202
Telephone: 704.339.0304
Fax: 704.338.5337
jmoss@maynardnexsen.com
kzhao@maynardnexsen.com

*Attorneys for Plaintiff The Guardian
Life Insurance Company of America*